

BRADLEY/GROMBACHER, LLP

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANDREA RIDGELL, on behalf of herself
and others similarly situated

Plaintiff,

v.

FRONTIER AIRLINES, INC. a Colorado
corporation; AIRBUS S.A.S., a foreign
corporation doing business in the State of
California; AIRBUS GROUP HQ INC., a
corporation doing business in the State of
California

Defendants.

Case No.: 2:18-CV-04916 PA (AFMx)

**DECLARATION OF KILEY L.
GROMBACHER IN SUPPORT OF
MOTION FOR CLASS
CERTIFICATION**

DATE: 11/19/18

TIME: 1:30 p.m.

DEPT: 9A

DECLARATION OF KILEY L. GROMBACHER

I, Kiley Lynn Grombacher, declare as follows:

1. I am an attorney duly admitted to practice law before this Court and I am a member in good standing of the State Bar of California, the State Bar of Tennessee, and in the Third and Ninth Circuits.

2. I am a named partner at Bradley/Grombacher, LLP counsel for Andrea Ridgell ("Plaintiff").

3. In my capacity as counsel, I have been actively involved with all aspects of this litigation. Accordingly, I have personal knowledge of all the matters set forth herein, and if called, I could and would competently testify to the following:

4. This Declaration is submitted in support of the Motion for Class Certification, and specifically to address the adequacy of Bradley/Grombacher LLP, to be appointed class counsel by this Court.

RELEVANT PROCEDURAL HISTORY

5. Plaintiff filed this action on June 1, 2018.

6. Pursuant to Local Rule 23-3, the deadline for the filing of Plaintiff's motion for class certification was September 13, 2018. Currently, by Order of the Court the current deadline is October 22, 2018.

7. Plaintiff served defendant Frontier on or about June 15, 2018.

8. As a professional courtesy to Frontier, Plaintiff stipulated to provide Frontier an additional thirty-nine (39) days in which to file an answer to the complaint. Frontier filed an answer to the complaint on August 14, 2018.

9. Plaintiff voluntarily dismissed defendant Airbus Group HQ, Inc., pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) on July 16, 2018.

10. Given that defendant Airbus S.A.S. ("Airbus") is a foreign corporation, service must be effectuated through protocols established by the Hauge Convention.

11. Shortly after filing, Plaintiff caused the complaint and all initiating documents to be translated into French.

